

**ENTERED**

September 13, 2023

Nathan Ochsner, Clerk

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>Fieldwood Energy III LLC, et al.,</b>  <b>Post-Effective Date Debtors<sup>1</sup>.</b>	§ § § § § §	<b>Case No. 20-33948 (MI)</b>  <b>Chapter 11</b>  <b>Jointly Administered</b>
--	----------------------------	---

**STIPULATION AND AGREED ORDER EXTENDING RESPONSE DATE AND  
RESETTING HEARING DATE ON PLAN ADMINISTRATOR’S OBJECTION TO  
PROOFS OF CLAIM FILED BY ANKOR ENERGY LLC  
AND ANKOR E&P HOLDINGS CORPORATION**

**[Relates to Docket. No. 2825]**

This stipulation and agreement (the “**Stipulation**”) is entered into by and among (i) David Dunn, the plan administrator (the “**Plan Administrator**”) appointed pursuant to the Notice of (I) Entry of Order Confirming Joint Chapter 11 Plan of Fieldwood Energy LLC and its Affiliated Debtors [Docket No. 2016]<sup>2</sup>; and (ii) ANKOR Energy LLC and ANKOR E&P Holdings Corporation (collectively, “**ANKOR**”) regarding the Plan Administrator’s Objection to ANKOR’s Proofs of Claim [Docket No. 2825] (the “**Objection**”). The Parties hereby stipulate and agree as follows:

**WHEREAS**, on or about November 23, 2020, ANKOR timely filed separate proofs of claim identified as Claim Numbers 490, 508, 513, and 516 (collectively, the “**ANKOR Proofs of Claim**”).

**WHEREAS**, the Plan Administrator filed his Objection on August 15, 2023, which included

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III, LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtor), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

<sup>2</sup> Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Plan.

a response date of September 14, 2023, and a hearing on October 2, 2023, at 10:30 a.m. CST.

**WHEREAS**, the Parties have agreed to enter into and jointly submit this Stipulation extending ANKOR's response date and resetting the date of the hearing in connection with the Objection.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:**

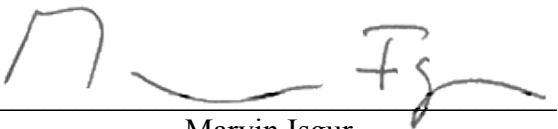
1. ANKOR's deadline to respond to the Objection is extended to and through **Wednesday, December 13, 2023**, subject to further extensions based on the Parties' agreement.

2. The hearing on the Objection is reset to **January 24, 2024, at 9:00 AM CST**.

**IN WITNESS WHEREOF**, this Stipulation has been executed and delivered as of the day and year first written below.

**IT IS SO ORDERED.**

Signed: September 13, 2023

  
\_\_\_\_\_  
Marvin Isgur  
United States Bankruptcy Judge

**BOND ELLIS EPPICH SCHAFFER JONES  
LLP**

/s/ Aaron Guerrero

Ken Green

Texas Bar No. 24036677

Aaron Guerrero

Texas Bar No. 24050698

Bryan Prentice

Texas Bar No. 24099787

950 Echo Lane, Suite 120

Houston, Texas 77024

(713) 335-4990 telephone

(713) 335-4991 facsimile

[Ken.green@bondsellis.com](mailto:Ken.green@bondsellis.com)

[Aaron.guerrero@bondsellis.com](mailto:Aaron.guerrero@bondsellis.com)

[Bryan.prentice@bondsellis.com](mailto:Bryan.prentice@bondsellis.com)

**ATTORNEYS FOR DAVID DUNN, PLAN  
ADMINISTRATOR FOR THE POST-  
EFFECTIVE DATE DEBTORS**

-and-

**LOOPER GOODWINE P.C.**

/s/ Paul J. Goodwine

Paul J. Goodwine (La. Bar No. 23757)

SDTX Federal ID No. 437800

Lindsey M. Johnson (La. Bar No. 34610)

SDTX Federal ID No. 2127344

650 Poydras Street, Suite 2400

New Orleans, Louisiana 70130

Telephone: (504) 503-1500

Facsimile: (504) 503-1501

Email: [pgoodwine@loopergoodwine.com](mailto:pgoodwine@loopergoodwine.com)

Email: [ljohnson@loopergoodwine.com](mailto:ljohnson@loopergoodwine.com)

**ATTORNEYS FOR ANKOR ENERGY  
LLC AND ANKOR E&P HOLDINGS  
CORPORATION**